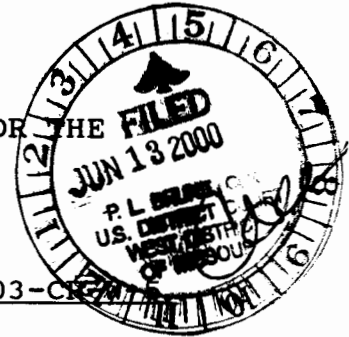


IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION



UNITED STATES OF AMERICA,

Plaintiff,

v.

NORBERTO TORRES ALVERADO,  
a/k/a "Roberto,"  
[DOB: 6/6/58]

STEPHEN V. SANDERS,  
a/k/a "Vinnie,"  
[DOB: 04/13/64]

and

MARY L. SANDERS,  
[DOB: 06/11/64]

Defendants.

No. 00-00199-01/03-CR

COUNT ONE: All Defendants  
21 U.S.C. § 846

NLT 10 Years; NMT Life  
Imprisonment

NMT \$4,000,000 Fine  
NLT 5 Years Supervised Release  
Class A Felony

COUNT TWO: Defendants Stephen  
Sanders and Mary L. Sanders  
21 U.S.C. § 853  
Criminal Forfeiture

\$100 Mandatory Special Assessment  
(Each Count)

S U P E R S E D I N G I N D I C T M E N T

THE GRAND JURY CHARGES:

COUNT ONE

That from on or about July 1, 1995, to on or about April 15, 2000, in Kansas City, Jackson County, in the Western District of Missouri, NORBERTO TORRES ALVERADO a/k/a "Roberto", STEPHEN V. SANDERS, a/k/a "Vinnie," and MARY L. SANDERS, defendants herein, did knowingly and intentionally combine, conspire, confederate, and agree with each other and others, known and unknown to the grand jury, to distribute marijuana, a Schedule I controlled substance, in an amount of one-thousand (1000) kilograms or more, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A); all in violation of Title 21, United States Code, Section 846.

ORIGINAL

COUNT TWO

The allegations of Count One are realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 21, United States Code, Section 853.

As a result of the offenses alleged in the above identified count, STEPHEN V. SANDERS and MARY L. SANDERS, defendants herein, shall forfeit to the United States all property, real and personal, constituting or derived from, any proceeds the defendants obtained, directly or indirectly, as a result of the aforesaid violations, as to which property defendants are jointly and severally liable, and all property used, or intended to be used, in any manner or part to commit or to facilitate the commission of such violations, including, but not limited to the following:

Cash Proceeds

Approximately \$2,500,000 in United States currency, and any interest and proceeds traceable thereto, in that such sum in aggregate was received in exchange for the distribution of controlled substances, or is traceable thereto.

Substitute Assets

If any of the property described above as being subject to forfeiture as a result of any act or omission of the defendants:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;

- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property, that is \$2,500,000.

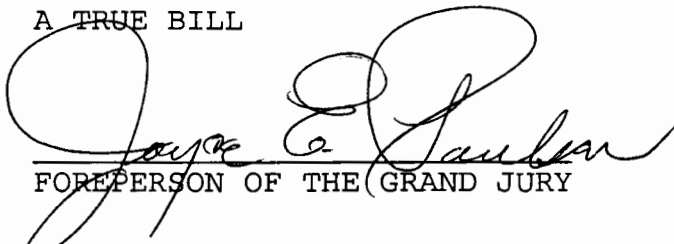
- A. The real property located at 6435 Wornall Terrace, Kansas City, Missouri, more fully described as Lot 13, Block 5, Greenway Fields, a subdivision of Kansas City, Missouri, Jackson County, Missouri.
- B. The real property located at 1323 Meadowlake Terrace, Kansas City, Missouri, more fully described as All of Lot 6, measured parallel with Southerly line of said lot, and the Southwesterly 10 feet of Lot 7, Block 31, Meadowlake, a subdivision of Kansas City, Jackson County, Missouri.
- C. The real property located at 750 Bonair, LaJolla, California, more fully described as Parcel 1: The Westerly  $\frac{1}{2}$  of the Southerly  $\frac{1}{2}$  of Lot 14 in Block "D" of Starkey's Prospect Park, in the City of San Diego, State of California, according to Map thereof No. 1729, filed in the Office of the County Recorder of San Diego County, May 6, 1922; and Parcel 2: An easement for gas pipelines purposes over the Easterly 2 feet of the North Half of Lot 13 and the Easterly 2 feet of the Northerly 2 feet of the South Half of Lot 13, both in said Block "D" of Starkey's Prospect Park, in the City of San Diego, County of San Diego, State of California, according to Map thereof No. 1729, filed in the Office of the County Recorder of San Diego County, May 6, 1922, the South line of the North Half of said Lot 13 being parallel with the North line of said Lot.
- D. The real property located at 8421-8423 Grandview Lane, Overland Park, Kansas, more fully described as Lot 5, Block 1, Galway Domain, a subdivision into the city of Overland Park, Johnson County, Kansas.
- E. A 1994 Chevrolet Corvette, VIN #1G1YY32P5R5115841.
- F. A 1998 Mercedes Benz, ML320, VIN #4JGAB54E5WA034371.

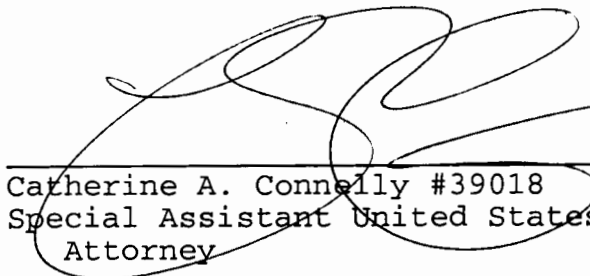
- G. One (1) Ladies Rolex Oyster Perpetual Date-Just Chronometer in Stainless Steel and 18 carat yellow gold, Jubilee Bracelet Diamonds set in Dial and Bezel. Dial (10), Bezel (40), Serial Number X712457.
- H. One (1) Ladies yellow gold cast and assembled diamond solitaire style ring, stamped '14K' inside shank. Set in center six prong setting with one round brilliant diamond measuring approximately 11.5mm-11.6mm x est. 6.9mm at est. 5.41 Cts. of VVS, internal clarity and faint light brown/champagne color, equivalent to M body color in yellow series, with 49% pavilion, polished and faceted medium-slightly thick girdle, 67% table, and class III proportions.
- I. One (1) Ladies yellow gold cast and assembled diamond 'S' style tennis bracelet, measuring approximately 8" in overall length and stamped, '14K' on catch. Set in four prong settings with a total of fifty-two round brilliant diamonds measuring approximately 3.0mm each at est. .10 Ct. each of VS(2) - SI(1) average internal clarity and G-I average color, with class II average proportions.
- J. One (1) Ladies yellow gold case and assembled diamond ring/pendant stamped, '14K' on reverse side and inside shank. Set in center four prong setting with one oval diamond measuring approximately 10.7mm x 7.62mm x 4.35mm at est. 2.28 Cts. of VS(1) internal clarity and R-T color, with a polished and faceted girdle, 59% table, and class II proportions. Set in prong settings around center with a total of four round brilliant diamonds measuring approximately 2.2mm each at est. .04 Ct. each of SI(2) - I(1) average internal clarity and G-I average color, and class III average proportions. Set also with a total of twelve round brilliant diamonds measuring approximately 1.8mm - 1.9mm each at est. .02 Ct. of each SI(2) - I(1) average internal clarity and G-I average color, and class III average proportions. Set around outer edge in single prong settings with a total of thirty-two tapered baguette diamonds measuring approximately from 3.0mm x 1.8mm - 1.5mm to 4.0mm x 1.7mm x 1.5mm at est. average .06 Ct. each of SI(2) - I(1) average internal clarity and G-I average color. Ring has a hidden safety lock on under bezel.
- K. One (1) Ladies yellow gold cast and assembled kunzite ring stamped, '14K' inside shank. Set in center four prong setting with one oval kunzite measuring approximately 12.2mm x 9.4mm at est. 6.68 Cts. of VVS

internal clarity and very pale pink hue, tone 3,  
saturation 3.

All in violation of Title 21, United States Code, Section  
853.

A TRUE BILL

  
FOREPERSON OF THE GRAND JURY

  
Catherine A. Connelly #39018  
Special Assistant United States  
Attorney

Dated: 06/13/00  
Kansas City, Missouri